

EXHIBIT 4

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.: 196924 NAME: Edward Han FIRM NAME: Paul Hastings LLP STREET ADDRESS: 1117 S. California Ave CITY: Palo Alto STATE: CA ZIP CODE: 94304 TELEPHONE NO.: 1 (650) 320-1800 FAX NO.: 1 (650) 320-1900 E-MAIL ADDRESS: edwardhan@paulhastings.com ATTORNEY FOR (name): Benjamin Fisch and Charles Lu	E-RECEIVED <small>FOR COURT USE ONLY</small> by Superior Court of CA, County of Santa Clara, on 2/16/2022 1:00 PM Reviewed By: R. Walker Case #20CV372622 Envelope: 8305182
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 191 N. First Street MAILING ADDRESS: 191 N. First Street CITY AND ZIP CODE: San Jose, CA 95113 BRANCH NAME: Civil	
PLAINTIFF/PETITIONER: TEMUJIN LABS INC. DEFENDANT/RESPONDENT: ARIEL ABITTAN, BENJAMIN FISCH, and CHARLES LU OTHER: DOES 1-10, inclusive	CASE NUMBER: 20CV372622 JUDICIAL OFFICER: Hon. Sunil R. Kulkarni
PROPOSED ORDER (COVER SHEET)	DEPT: 1

NOTE: This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:
Defendants and Cross-Complainants Benjamin Fisch and Charles Lu
2. Title of the proposed order:
STIPULATION AND [PROPOSED] ORDER REGARDING SERVICE OF AND RESPONSE TO CROSS-COMPLAINT
3. The proceeding to which the proposed order relates is:
 - a. Description of proceeding: N/A
 - b. Date and time: N/A
 - c. Place: N/A
4. The proposed order was served on the other parties in the case.

Edward Han

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

CASE NAME: TEMUJIN LABS INC. v. ARIEL ABITTAN, BENJAMIN FISCH, and CHARLES LU	20CV372622
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**PROOF OF ELECTRONIC SERVICE
PROPOSED ORDER**

1 CASE NUMBER:

1. I am at least 18 years old and **not a party to this action**.

a. My residence or business address is (*specify*):

1117 S. California Avenue Palo Alto, California 94304

b. My electronic service address is (*specify*): nanettecosentino@paulhastings.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On (*name of person served*) (*If the person served is an attorney, the party or parties represented should also be stated.*):

Craig A. Hansen, Stephen C. Holmes - Attorney for Plaintiff Temujin Labs Inc. (Delaware) and Temujin Labs Inc. (Cayman)

b. To (*electronic service address of person served*): craig@hansenlawfirm.net. steve@hansenlawfirm.net

c. On (*date*): February 16, 2022

☐ Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: February 16, 2022

Nanette Cosentino

(TYPE OR PRINT NAME OF DECLARANT)



Nanette Cosentino

(SIGNATURE OF DECLARANT)

Envelope #8305182

EDWARD HAN (SB# 196924)
edwardhan@paulhastings.com
JESSICA E. MENDELSON (SB# 280388)
jessicamendelson@paulhastings.com
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, California 94304
Telephone: (650) 320-1800
Facsimile: (650) 320-1900

JENNIFER BALDOCCHI (SB#168945)
jenniferbaldocchi@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, California 90071
Telephone: (213) 683-6000
Facsimile: (213) 627-0705

Attorneys for Defendants and Cross-Complainants
Benjamin Fisch and Charles Lu

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA CLARA

TEMUJIN LABS INC.

Plaintiff,

vs.

ARIEL ABITTAN, BENJAMIN FISCH,
CHARLES LU, and DOES 1-10, inclusive,

Defendants.

CASE NO. 20CV372622

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING SERVICE OF AND
RESPONSE TO CROSS-COMPLAINT**

Action Filed: November 6, 2020

WHEREAS, on November 17, 2021, Cross-Complainants Benjamin Fisch and Charles Lu (collectively “Cross-Complainants”) filed a cross-complaint against plaintiff Temujin Labs Inc. and individual cross-defendants named as Lily Chao (a/k/a Tiffany Chen, a/k/a Yuting Chen) and Damien Ding (a/k/a Damien Leung, a/k/a Tao Ding) (collectively “Individual Cross-Defendants”);

WHEREAS, the Cross-Complainants filed an *ex parte* application related to service of and responses to that cross-complaint on February 10, 2022;

WHEREAS, the Individual Cross-Defendants, by special appearance, filed an opposition to the *ex parte* application on February 14, 2022; and

WHEREAS, the Court held a hearing on February 14, 2022, and proposed a resolution which both parties accepted.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, through their undersigned counsel, that, subject to and upon approval by the Court of this stipulation:

1. Counsel for Cross-Complainants will accept service of the complaint filed in the action entitled *Temujin Labs Inc., et al. v. Translucence Research, Inc., et al.*, U.S. District Court, Northern District of California, Oakland Division, Case No. 4:21-cv-09152-JST (filed Nov. 24, 2021) on behalf of Charles Lu; and

2. Counsel for Individual Cross-Defendants will accept service of the cross-complaint in this action on behalf of the Individual Cross-Defendants, and the Individual Cross-Defendants will then have thirty (30) days to respond to the cross-complaint from the date the Court signs and approves this stipulation.

DATED: February 16, 2022

PAUL HASTINGS LLP

By: 

EDWARD HAN

Attorneys for Cross-Complainants

DATED: February 16, 2022

HANSEN LAW FIRM, P.C.

By: 

CRAIG HANSEN

Attorneys for Individual Cross-Defendants

~~[PROPOSED]~~ ORDER

Pursuant to the stipulation of the Parties, and good cause appearing therefor, the Court approves the stipulation and orders the following:

1. Counsel for Cross-Complainants will accept service of the complaint filed in the action entitled *Temujin Labs, Inc., et al. v. Translucence Research, Inc., et al.*, U.S. District Court, Northern District of California, Oakland Division, Case No. 4:21-cv-09152-JST (filed Nov. 24, 2021) on behalf of Charles Lu; and

2. Counsel for Individual Cross-Defendants will accept service of the cross-complaint in this action on behalf of the Individual Cross-Defendants, and the Individual Cross-Defendants will then have thirty (30) days to respond to the cross-complaint from the date of this Order.

IT IS SO ORDERED.

DATED: February 16, 2022



Hon. Sunil R. Kulkarni
JUDGE OF THE SUPERIOR COURT